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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and
 LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;
 CITISTAFF SOLUTIONS, INC.; WEST
 VALLEY STAFFING GROUP;
 CHARTWELL STAFFING SERVICES, INC.;
 and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

PARTIES REQUESTED VOIR DIRE

Date: May 11, 2020

Time: 10:00 a.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: June 8, 2020

Complaint filed: October 16, 2017

TO THE HONORABLE COURT:

The Parties submit the following questions for voir dire.

PLAINTIFF'S REQUESTED QUESTIONS

1. Are any of you big fans of Elon Musk, his inventions, or his companies Tesla or SpaceX? If yes, please explain.
2. Have you ever had a job where you made important financial or personnel decisions for a company, such firing decisions? If yes, please explain.
3. Have you ever developed the belief that the laws in California are too employee-friendly or unfair toward employers, from what you've seen or heard? If yes, please explain.
4. Have you ever seen someone make a false accusation of racism or harassment in the workplace? If yes, please explain.
5. Have you ever seen someone overreact or get offended by a harmless or joking comment in the workplace? If yes, please explain.
6. Have you ever known someone who was falsely accused of racism or discrimination? If yes, please explain.
7. Have you ever had a job where you had to deal with complaints or accusations of discrimination or mistreatment by employees for your company? If yes, please explain.
8. Have you ever worked with a co-worker who you felt was oversensitive, too easily offended, or misinterpreted harmless things? If yes, please explain.
9. Have you ever worked in a workplace where co-workers often made racial jokes or 'trash talk' with each other without being offended? If yes, please explain.
10. Have you ever worked for a company that had workplace conduct rules that seemed too strict or too politically correct? If yes, please explain.
11. Have you ever seen or heard about someone playing the "race card" to get special treatment? If yes, please explain.
12. Do you believe that it's wrong to file a lawsuit over racial harassment instead of just toughing it out, ignoring it, and moving on with your life? If yes, please explain.
13. Do you believe that an employee who quits their job due to mistreatment should never be allowed to file a lawsuit for losing their job under any circumstance? If yes, please explain.

14. Do you believe that the decision to quit a job is always voluntary, and that no one ever has no choice but to quit because of workplace harassment? If yes, please explain.
15. Do lawsuits seeking money for emotional distress seem frivolous, wrong, or rub you the wrong way? If yes, please explain.
16. Have you ever been involved in hiring, managing, or supervising workers who weren't considered employees of your company, such as temps, independent contractors, or provided to your company by a staffing agency? If yes, please explain.
17. Have you ever been a temp or an independent contract who did work for one company but was hired and paid by another company? If yes, please explain.
18. Have you ever worked for a company that outsourced work or staffing to another company's workers or temps? If yes, please explain

DEFENDANT'S REQUESTED QUESTIONS

1. Knowledge of Tesla, Auto Manufacturers
 - a. Have you or anyone close to you ever worked for or at the Tesla Fremont facility?
 - b. Have you or anyone close to you ever owned or leased a Tesla?
 - c. Have you or anyone close you ever worked at an automotive manufacturing plant or company?
 - d. Have you or anyone close to you worked for a tech company in Silicon Valley?
 - e. Opinions as to Elon Musk? His public persona, his tweets?
2. Race Discrimination or Harassment
 - a. Have you or anyone close to you ever been the victim of race discrimination or harassment at work?
 - b. Have you or anyone close to you ever worked in Human Resources?
 - c. Have you or anyone close to you ever brought a complaint to Human Resources?
 - d. Have you or anyone close to you ever been accused of racial harassment or discrimination?

- 1 e. Have you or anyone close to you ever accused anyone of race discrimination or
2 harassment?
- 3 f. Have you or anyone close to you ever worked in a work environment that you felt
4 was racially hostile?
- 5 g. Have you or anyone close to you ever been the victim of violence in the workplace?
- 6 h. Have you or anyone close to you ever been threatened with violence in the
7 workplace?
- 8 i. Have you or anyone close to you ever been accused of threatening someone in the
9 workplace?

10 3. Staffing Agency Knowledge

- 11 a. Have you or anyone close to you ever worked for a temporary staffing company?
- 12 b. Ever work for West Valley Staffing Group, Chartwell Staffing, CitiStaff Solutions, or
13 nextSource?

14 CALIFORNIA CIVIL RIGHTS LAW GROUP

15 ALEXANDER KRAKOW + GLICK LLP

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18 DATED: April 27, 2020

19 By: /s/
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26 DATED: April 27, 2020

27 Bv /s/
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28 Attorneys for Defendant
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SMRH:4838-1461-2922.3

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